

concludes that one of ordinary skill in the art would be motivated to build a two-tiered parsing system as is presently claimed. All that Eschbach states in Column 1, line 19 is that there are two classes of images, black/white and color, no more - no less. Contrary to the Examiner's very liberal and expansive reading of Column 1, line 19, Eschbach fails to disclose the dividing of an image into its neutral and non-neutral components.

In conclusion, the Examiner has relied on a single line from Eschbach that simply recognizes two classes of images to derive a teaching that Eschbach suggests the dividing of an image into its neutral and non-neutral components. Moreover, the Examiner has failed to demonstrate how Robinson overcomes this deficiency in Eschbach. Therefore, since Eschbach fails to teach or even suggest the Examiner's characterization and Robinson is void of any teachings with respect to parsing, the Examiner's conclusion of obviousness fails.

Accordingly, in view of the above remarks, the Examiner is respectfully requested to reconsider and withdraw this rejection.

Claim 4 has been rejected under 35 U.S.C. §103 as being unpatentable over Eschbach in view of Tai. This rejection is respectfully traversed.

In formulating the rejection under 35 U.S.C. §103, the Examiner alleges that Eschbach teaches a parser circuit (Column 1, line 19) to parse neutral image data into black image data, white image data, and grey image data, and an image processing circuit to process the neutral image data (Column 10, lines 1-20). The Examiner further suggests that although Eschbach fails to teach a parser to parse an image into neutral image data and non-neutral image data, Eschbach suggests such a feat. The Examiner points to a single line wherein Eschbach states that images may either be black/white or color. From this simple statement in Eschbach, the Examiner concludes that one of ordinary skill in the art would be motivated to build a two-tiered parsing system as is presently claimed. All that Eschbach states in Column 1, line 19 is that there are two classes of images, black/white and color, no more - no less. Contrary to the Examiner's very liberal and expansive reading of Column 1, line 19, Eschbach fails to disclose the dividing of an image into its neutral and non-neutral components.

Tai teaches a color transformation circuit 50 which transforms the image data from one color space (RGB) to a second color space (Lab). By the Examiner's own admission, one of

ordinary skill in the art clearly recognizes that color transformation is not parsing and that Tai fails to teach that this simple color transformation circuit provides any type of parsing function as claimed.

In conclusion, the Examiner has relied on a single line from Eschbach that simply recognizes two classes of images to derive a teaching that Eschbach suggests the dividing of an image into its neutral and non-neutral components. Moreover, the Examiner has failed to demonstrate how Tai overcomes this deficiency in Eschbach. Therefore, since Eschbach fails to teach or even suggest the Examiner's characterization and Tai is void of any teachings with respect to parsing, the Examiner's conclusion of obviousness fails.

Accordingly, in view of the above remarks, the Examiner is respectfully requested to reconsider and withdraw this rejection.

Claim 6 has been rejected under 35 U.S.C. §103 as being unpatentable over Tai in view of Eschbach and Robinson. This rejection is respectfully traversed.

In formulating the rejection under 35 U.S.C. §103, the Examiner recognizes that Tai fails to teach a parser circuit, but the Examiner alleges that Eschbach teaches a parser circuit (Column 1, line 19) to parse neutral image data into black image data, white image data, and grey image data, and an image processing circuit to process the neutral image data (Column 10, lines 1-20). The Examiner further suggests that although Eschbach fails to teach a parser to parse an image into neutral image data and non-neutral image data, Eschbach suggests such a feat. The Examiner points to a single line wherein Eschbach states that images may either be black/white or color. From this simple statement in Eschbach, the Examiner concludes that one of ordinary skill in the art would be motivated to build a two-tiered parsing system as is presently claimed. All that Eschbach states in Column 1, line 19 is that there are two classes of images, black/white and color, no more - no less. Contrary to the Examiner's very liberal and expansive reading of Column 1, line 19, Eschbach fails to disclose the dividing of an image into its neutral and non-neutral components.

Tai teaches a color transformation circuit 50 which transforms the image data from one color space (RGB) to a second color space (Lab). By the Examiner's own admission, one of ordinary skill in the art clearly recognizes that color transformation is not parsing and that Tai

fails to teach that this simple color transformation circuit provides any type of parsing function as claimed.

In conclusion, the Examiner has relied on a single line from Eschbach that simply recognizes two classes of images to derive a teaching that Eschbach suggests the dividing of an image into its neutral and non-neutral components. Moreover, the Examiner has failed to demonstrate how Tai and/or Robinson overcome this deficiency in Eschbach. Therefore, since Eschbach fails to teach or even suggest the Examiner's characterization and Tai and/or Robinson are void of any teachings with respect to parsing, the Examiner's conclusion of obviousness fails.

Accordingly, in view of the above remarks, the Examiner is respectfully requested to reconsider and withdraw this rejection. Also, an early indication of allowability is earnestly solicited.

Respectfully submitted,



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